

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

WILLIE M. TURNER,)
)
Plaintiff,) Civil Action No. 1:18-CV-01955-DCN
)
v.) Judge: Hon. Donald C. Nugent
)
CBC NATIONAL BANK,) Report of Parties' Planning Meeting
)
Defendant.) Under Fed. R. Civ. P. 26(f) and L.R.
)
) 16.3(b)
)

1. Pursuant to FED. R. CIV. P. 26(f) and LR 16.3(b), a meeting was held on October 3, 2018, and was attended by:

Marwan R. Daher counsel for plaintiff Willie Turner

Keith S. Anderson counsel for defendant CBC National Bank

2. The parties will exchange the pre-discovery disclosures required by FED. R. CIV. P. 26(a)(1) and the Court's prior order such disclosures by **October 31, 2018**.

3. The parties recommend the following track:

Expedited Standard Complex

Administrative Mass Tort

4. This case is suitable for one or more of the following Alternative Dispute Resolution (ADR) mechanisms:

Early Neutral Evaluation Mediation Arbitration

Summary Jury Trial Summary Bench Trial

Case not suitable for ADR

The parties will advise the Court on ADR at the Status Conference.

5. The parties do/ **do not** consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 U.S.C. § 636(c).

6. Recommended Discovery Plan:

- (a) Describe the subjects on which discovery is to be sought and the nature and extent of discovery.
- **The number of calls placed by CBC to Plaintiff's cell phone**
 - **Whether CBC used an automatic telephone dialing system (ATDS) to place the calls**
 - **Whether CBC used an artificial or prerecorded voice messages**
 - **Whether calls were placed to Plaintiff with Plaintiff's prior express written consent**
 - **Whether Plaintiff revoked his consent to receive calls from CBC by any reasonable means**
 - **The nature of discovery will be Plaintiff's call records, Defendant's business records, the testimony of the parties, and the testimony of third-party witnesses, if any.**

- (b) The parties (indicate one):

_____ agree that there will be no discovery of electronically-stored information;
or

_____ have agreed to a method for conducting discovery of electronically-stored information and will produce documents in PDF format; or

_____ have agreed to follow the default standard for discovery of electronically-stored information (Appendix K to Northern District Ohio Local Rules)

- (c) Non-Expert Discovery cut-off date: **April 30, 2019**

- (d) Plaintiff's (or party with the burden of proof on an issue) expert report due date: **June 15, 2019**.

Defendant's (or party without the burden of proof on an issue) due

date: **July 15, 2019**

Expert Discovery cut-off date: **September 15, 2019**

7. Recommended dispositive motion date: **October 15, 2019**
8. Recommended cut-off date for amending the pleadings and/or adding additional parties: **November 16, 2018**
9. Recommended date for a Status Hearing: **On or after May 15, 2019.**
10. Other matters for the attention of the Court:

N/A

Respectfully submitted this 16th day of October, 2018,

s/Marwan R. Daher
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